

BENNY AGOSTO, JR, P.C.\*  
MUHAMMAD S. AZIZ, P.C.\*  
BRANT J. STOGNER, P.C.\*

FRANK T. ABRAHAM  
(1924-2004)

W. W. WATKINS  
(1920-1987)

NICK C. NICHOLS, P.C.  
(RETIRED PARTNER)

\*BOARD CERTIFIED: PERSONAL INJURY TRIAL LAW  
TEXAS BOARD OF LEGAL SPECIALIZATION

\*SENIOR ASSOCIATE

\*\*OF COUNSEL

LAW OFFICES

**ABRAHAM, WATKINS, NICHOLS,  
AGOSTO, AZIZ & STOGNER**

800 COMMERCE STREET  
HOUSTON, TEXAS 77002-1776

(713) 222-7211

FAX (713) 225-0827

1-800-870-9584

[WWW.ABRAHAMWATKINS.COM](http://WWW.ABRAHAMWATKINS.COM)

MICHELLE A. RICE \*  
IMRANA MANZANARES, R.N., J.D.  
JONATHAN D. SNEED  
JENNIFER O'BRIEN STOGNER\*\*  
ANGELINA WIKE  
LENA B. LAURENZO  
KARL P. LONG  
CHRISTOPHER D. MAHFOUZ  
EDWARD A. FESTERYGA  
BEN AGOSTO III  
NANCY FLORES  
DAVID J. BALUK  
JONATHAN TAYLOR PACE  
SOROUSH MONTAZARI  
SPENCER T. SPEED  
BARNEY P. DILL  
WILLIAM N. FARMER  
WADY S. RAHBANI-CHAVEZ  
ALICIA K. PATTERSON

MORGAN MILLS  
RAMSEY AL-AZEM

November 14, 2022

**Via FOIAOnline Portal**

Environmental Protection Agency  
Attn: Records Division

Re: Freedom of Information Act Request

Client: Wheeler, Seth; Day, Dustin; et al.  
DOI: 07/27/2021  
Location: 1515 Miller Cut Off Rd, La Porte, TX 77571  
Approx. time: 19:15  
Person(s) recorded: Seth Wheeler, Dustin Day, Scott Skains

Greetings:

I am investigating the above-referenced incident. On July 27, 2021, over 100,000 pounds of a mixture of various harmful chemicals were released into the above-referenced complex.

To complete my investigation, through the Freedom of Information Act, I request your office release pertinent data regarding this incident, including *complete copies* of the following:

1. Environmental Protection Agency's (EPA) full investigation file.
2. Incident report, including all supplements and amendments.
3. Calls for service reports.
4. Incident notifications.
5. Communication to/from onsite personnel, including LyondellBasell and/or law enforcement agencies.
6. Body worn camera footage.
7. Dash camera footage.
8. Drone camera footage.

9. Video surveillance footage recovered by investigators from the scene and/or surrounding businesses and/or buildings.
10. Video footage, photos, audio recordings, or messages recovered by investigators from any mobile devices.
11. Photographs – *produced in their original format (i.e., not scanned or thumbnails)* – taken or obtained of all vehicles and the scene.
12. Total Station Data and/or 3D scan photographs, along with all corresponding raw scan files and/or data.
13. Detailed or scaled diagrams of the scene performed by investigators.
14. Witness and/or Unit statements, written and/or recorded, obtained by investigators at the scene and throughout the duration of the investigation.
15. Violations issued.
16. Field notes written by any investigating officer involved in the investigation.
17. Evidence collected by investigators that has been released and/or is being held by EPA.
18. Air monitoring data collected and/or measured.

Please advise me of any fees for this service and I will remit payment promptly. If you have any questions, please contact me at (713) 222-7211. If you prefer to communicate with me via email, my address is [jmeador@awtxlaw.com](mailto:jmeador@awtxlaw.com) and you have my permission to use that form of communication. Thank you for your time and help.

Regards,

*/s/ Joseph Meador*

Joseph Meador  
Firm Investigator

JM/lbl